



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

April 10, 2006

Ms. Sandra Hilton
Office of Environmental Assessment,
Environmental Planning Division,
P.O. Box 4314
Baton Rouge, LA 70721-4314

Dear Ms. Hilton:

Our office has reviewed the Louisiana Department of Environmental Quality's proposed revisions to the 2005 General Revision to the State Implementation Plan, which includes revisions to LAC 33:III in Chapters 2, 5, 6, 9, 11, 14, 15, 21, 22, and 23.

Many revisions appear to be primarily non-substantive and clerical in nature from an Air Planning perspective. We support the revisions that revise rule references after department reorganization to reflect the new organizational structure. These are included in the section of your submittal entitled "OS 065, Organizational Changes Under New Administration." We also support the revision to §2305 in which the reference to repealed Chapter 31 is removed. We understand the revision removes definitions from this section, so what definitions now apply here?

The additional rules that were promulgated in 2004, all refer to the reporting requirements in LAC 33:I, Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. We do not expect to be able to act on these revisions because of concern with the approvability of LAC 33:I, Chapter 39.

Regarding the revision to §2115 in 2004 adoptions, we can support the changes in threshold reporting from 50 to 25 tpy for the Baton Rouge nonattainment area, and to 100 tpy for all other areas of the state with the exception of Calcasieu and Pointe Coupee Parishes, which remain at 50 tpy. All other sections not specifically discussed in this letter may be commented upon by the Air Permit Section.

We appreciate the opportunity to comment on these SIP revisions. If we may be of any assistance to you in the future, please feel free to contact me or Sandra Rennie of my staff at (214) 665-7367.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Thomas H. Diggs".

Thomas Diggs, Chief
Air Planning Section
EPA Region 6

Summary of Comments and Response
2005 State Implementation Plan

AQ248

Comment: The revision removes definitions from LAC 33:III.2305.C, so what definitions apply to LAC 33:III.Subchapter C. Phosphate Fertilizer Plants?

Response: This portion of AQ248 will be withdrawn and the corrected rulemaking will be submitted at a later date.

OS052

Comment: We do not expect to be able to act on the revisions to LAC 33:I.Chapter 39 because of concerns of Chapter 39 approvability.

Response All of OS052 has been withdrawn and will be resubmitted at a later date once EPA has approved LAC 33:I.Chapter 39.